

Statement by Milton Keynes Parks Trust for the Plan: MK Examination in Public

Appertaining to:

Matter 7: Infrastructure and Viability Issue 2: Infrastructure to Support Growth

Programmed for Public Examination Session 20th July 2018

Policy relating to the future stewardship of green infrastructure (including public open space)

Policy L4

1 Summary

- 1.1. Our contention is that Plan:MK as proposed is unsound because it has a deficiency within the current wording of Policy L4: Public Open Space Provision in New Estates. Specifically, this policy is inadequate in the requirements it sets for the future management and maintenance (stewardship) of green infrastructure in areas of development. This deficiency will limit the achievement of the Vision and Objectives of the Plan where these seek the delivery of 'a linked network of multi-functional, resilient and sustainable green infrastructure'.
- 1.2. Within this Statement, we set out our concerns regarding this policy deficiency and propose alternative wording for Policy L4 that will make it effective and sound.
- 1.3. This topic is relevant to Matter 7, Issue 2, Question 7.7. of the Plan:MK Examination Infrastructure to Support Growth (scheduled for 20th July). In addition to providing this written statement, we would welcome the opportunity to put forward our case at the Examination session on the matter of infrastructure provision.
- 1.4. The Vision of Plan:MK is for Milton Keynes to continue its reputation as a high quality place to live: "It will remain one of the greener cities in the UK with high environmental standards, ensuring that its children [and other residents] can continue to enjoy the green environment that makes it so unique." There are corresponding references to green infrastructure within Strategic Objectives 14, 15, 16 and 17 of the Plan.
- 1.5. In line with this, Plan:MK includes policies requiring developers to provide new and/or protect and retain existing types and features of green infrastructure within new development and growth areas. However, as well as its provision/retention as development takes place, green infrastructure requires effective long-term stewardship post-development, otherwise its value is lost or not realised and it becomes a liability that does not deliver public benefit. It is essential, therefore, that Plan:MK has a sound and effective policy to ensure that adequate provision for long term green infrastructure stewardship is made.
- 1.6. The matter of stewardship is covered, to an extent, within the current wording of Policy L4. However, the wording used is weak, with ambiguity in the language used. Whilst the policy sets out a requirement for developers to provide an outline of certain types of information about the future maintenance for public open space, it fails to set out any robust standards that management and maintenance arrangements must meet, apart from that they "can be implemented by local contractors or organisations", which is practically meaningless as a standard. As currently worded, therefore, the policy lacks clarity and will not lead to the creation of a planned environment where open spaces, parks and other types of green infrastructure are maintained to a consistent good standard for the common benefit of and enjoyment by the public. This risks undermining the character of Milton Keynes.
- 1.7. Within Milton Keynes, we can demonstrate in The Parks Trust a respected exemplar model of sustainable green infrastructure stewardship that has proven highly effective and has helped Milton Keynes establish and retain its reputation as a city with a high quality, well-maintained green environment. In this context, we believe the standards of green infrastructure stewardship represented in and achieved by The Parks Trust should be regarded as the benchmark for future stewardship arrangements for new green infrastructure. The policy within Plan:MK should make it clear that proposed stewardship arrangements that do not meet these standards will not be approved.

2 Introduction to Milton Keynes' Green Environment and The Parks Trust

Green infrastructure in Milton Keynes

- 2.1. Plan:MK refers to Milton Keynes' extensive and high quality green environment as being a unique feature of the city. The Plan's vision is for this reputation to be retained as the city grows. This reflects the original vision for the new town of Milton Keynes.
- 2.2. The city's linked network of parks and greenspaces have made an essential contribution to the success of the city. They have helped to attract people and businesses to the city and add significantly to the quality of life for its residents. The network includes the city's impressive linear parks; areas of ancient woodland; extensive areas of landscaping along the city's grid roads; and local open spaces within housing areas. As well as providing green space for people, the network also provides a diverse mosaic of habitats which has led to the biodiversity within the city being greater than that found in the surrounding countryside. The continued contribution of this network to the life and environmental quality of the city relies on its effective stewardship.
- 2.3. Milton Keynes Council's 'Public Open Space: Management Framework for MK' (2013) (Plan:MK Evidence Base Doc MK/ENV/012), states that the city's green network covers a large proportion of the city by area "over 30% of the total city area". The two main managing organisations for the network are identified as Milton Keynes Council with1,200 ha and Milton Keynes Parks Trust with 2,000 ha of open space land. In fact, the Parks Trust today owns and maintains over 2,460 hectares of green infrastructure of all types across the city, ranging from local sites including play areas within housing estates up to the large strategic linear parks that are cited in Plan:MK as one of the important defining features of the city.

The Parks Trust's model of green infrastructure stewardship in Milton Keynes

- 2.4. The Parks Trust (Milton Keynes Parks Trust Ltd) is an independent charity that was established by the Milton Keynes Development Corporation (MKDC) in 1992. It has three charitable objects: Providing, equipping and maintaining parks and open spaces; promoting environmental education; and providing leisure and recreational facilities within the green space all for the benefit of the inhabitants of the city and its environs.
- 2.5. The mechanism used to transfer land into the care of the Trust was via the MKDC (as landowner) granting the Trust 999-year leases of around 2,000 hectares of the city's strategic greenspaces and simultaneously transferring the freehold of the land to the local authorities, which became the Milton Keynes Council unitary authority in 1997. The leases place positive covenants on the Trust to maintain the land in good condition according to a range of criteria and to make the land accessible to by the public. This ownership and tenure structure provides a strong and secure basis for the stewardship of the greenspace maintained by a bespoke, public-focussed body as Tenant with underlying freehold and therefore control on what the land can be used for remaining with the Council as Landlord.
- 2.6. To provide the Parks Trust with a source of income, the MKDC transferred to it an endowment portfolio of commercial properties, the income-generating value of which was equated to the annual cost of maintaining the greenspaces.

- 2.7. At the same time as establishing the Parks Trust, the MKDC also transferred about 1,000 hectares of local green spaces direct to the Council (i.e. not subject to a lease to the Trust or any other organisation). These spaces comprised mainly local play areas, sports pitches and smaller areas of green space within housing estates. The MKDC also gave the Council an endowment calculated on an equivalent basis as compensation for taking the maintenance responsibility for the local greenspaces transferred to it.
- 2.8. Since 1992, the Trust has managed its endowment resources wisely and has become widely-regarded locally, nationally and internationally as a highly effective and successful exemplar for the sustainable, cost effective and publicly accountable stewardship of green infrastructure. Many see the existence and success of the Trust as an integral part of the story and success of Milton Keynes as one of the UK's greenest cities.
- 2.9. The successful outcomes of the Trust's establishment as a stewardship body for public green space include:
 - The parks and landscapes in its care are maintained to a high standard.
 - The scale of its operation enables it to benefit from economies of scale.
 - The careful management and growth of its endowment portfolio has enabled it to provide community ranger, environmental education and community engagement services, all at no cost to residents or the local authority.
 - Its secure financial base enables it to cover both routine maintenance and cyclical expenditure (e.g. periodic replacement of play equipment, footbridges, etc)
 - It has been able to invest in new facilities in the parks such as toilets, cafés and visitor/education centres. All income derived from these is re-invested back into the parks.
 - Its services are delivered in a strategic, joined-up way across the network in its care
 - It has a high public profile and is highly responsive to the needs of residents.
 - It employs a team of locally-based professional staff including a direct works team.
 - It employs local contractors to implement carefully-specified contracts.
 - It invests in skills development and training to ensure availability of the necessary skills and resources in future.
- 2.10. Key principles of the Trust's model include:
 - It is as a registered charity and company limited by guarantee.
 - It is governed by a Board of Trustees who are also directors of the company. All are
 local people who live and/or work in Milton Keynes. Three Trustees are nominated
 by Milton Keynes Council and one by the Milton Keynes Association of Parish
 Councils. The Board ensures that the Charity is properly managed and complies
 with all relevant legislation.
 - Its trustees have a duty under charity law to ensure that the Trust's assets and resources are only used to further its charitable objects.
 - This structure ensures the Trust remains solely dedicated to delivering its work for the benefit of the public in the city and is publicly accountable, both through the inclusion of locally-elected representatives on its Board and through the regulatory framework for charities overseen by the Charity Commission.
 - Its model of taking one-off endowments and investing these has enabled it to deliver its services at no on-going cost to residents of the Council.

- 2.11. Since its establishment, the Trust has taken additional greenspace from developers with cash endowments via the 999-year leases/freehold to Milton Keynes Council method. The endowments are calculated using guidance developed by English Partnerships in 2005 employing principles set out in the HM Treasury Green Book. Often, these endowment payments have been linked to Section 106 Planning Obligation agreements. In these cases, the endowment payments have been compared against the contribution rates for public open space maintenance that were set out in Milton Keynes Council's Supplementary Planning Guidance for Leisure and Recreation (2005) (to be superseded by the Council's proposed Planning Obligations Supplementary Planning Document.)
- 2.12. In contrast to the city's greenspaces managed by the Parks Trust, the areas of landscape that were transferred into the care of Milton Keynes Council are mostly in poor condition, an outcome of the increasing budgetary constraints the Council is facing in common with local authorities across the country. Unlike the Trust, the endowment given to the Council in 1992 was not protected, invested and grown for the purpose of maintaining the greenspace. Rather, the Council's obligation for maintaining their open spaces is met from their general revenue funds and, as green space is not a statutory requirement, this service is facing increasing pressure to deliver savings.
- 2.13. The Council is now looking to the Parks Trust or Parish Councils to take on the task of maintaining these areas. Discussions about potential mechanisms to enable this are ongoing.

The deficiencies of Policy L4 as currently written

2.14. Policy L4 as currently written has weaknesses in the way it deals with the requirements for the future stewardship of public open space. The 3rd and 4th paragraphs say:

"The provision, future management and maintenance of open space, parks and any artificial grass pitches or surfaces should be an integral part of new development, which should be considered at the beginning of the design process. Proposals will include a management and maintenance strategy for new or extended open space and green infrastructure, outlining details of the owner, the responsible maintenance body, and how long term financially suitable maintenance plan that can be implemented by contractors or organisations.

Proposals for new areas of open space and parks should include a long-term costed maintenance plan that can be implemented by local contractors or organisations."

- 2.15. Whilst this establishes the requirement for a "management and maintenance strategy" and/or "a costed maintenance plan" the wording only requires developers to provide an outline of categories of information about the future maintenance. It does not require any standards to be met or specify how management and maintenance arrangements will be assessed and deemed adequate, apart from that they "can be implemented by local contractors or organisations", which is practically meaningless as a standard. It is also not clear what "financially suitable" will mean.
- 2.16. As currently worded, therefore, the policy lacks clarity and will not lead to the creation of a planned environment where open spaces, parks and other types of green infrastructure are maintained by a suitable stewardship body to a good standard for the common benefit of and enjoyment by the public consistent with the existing public spaces in Milton Keynes.

- 2.17. There are a limited number of alternative models available to developers to provide for the future maintenance of public open space and green infrastructure. These include offering the land to the Council, Parish Council or the Parks Trust either within or out with the auspices of a planning agreement. The other main option, which is becoming more prevalent both locally and nationally, is that of transferring the land to a private management company, financed through service charges placed on residents.
- 2.18. The option of private management companies with the ability to charge residents offers the advantage to the developer of providing a means of disposing of the obligation and liability of maintaining public open space without the cost of providing resources for future maintenance, such as an endowment or commuted sum. However, the burden of paying services charges then rests with residents, which is becoming recognised nationally as issue where private estate companies have been alleged in some cases to have a limited profile with residents with a lack of transparency and accountability in how charges are set and how they are being applied.
- 2.19. There are other issues of developers transferring open spaces and green infrastructure in development areas to, potentially, a range of different private management companies. It will create a fragmented greenspace network, different standards of maintenance and the risk that residents paying service charges regarding the land as private rather than public space, objecting to non-residents accessing and using those areas. Also, private management companies can be bought, sold or closed down like all commercial businesses.
- 2.20. Such mechanisms have to be scrutinised carefully. Given the legacy of public realm in Milton Keynes an even higher standard has to be applied and should be set out in the plan policy.

Outline of potential stewardship standards

- 2.21. The assessment of whether a stewardship body would be suitable, adequately resourced and hold land under an appropriate form of tenure should be based on a clear set of criteria with certain minimum standards to be met. An outline of these is set out in the table in Appendix A on pages 13 and 14 of this statement.
- 2.22. These standards are already met by The Parks Trust. We believe the Parks Trust's standard could easily and properly be established as the benchmark for stewardship for the purposes of the policy. It is a tried and tested way of managing open space in Milton Keynes and has served the city very well for the past 26 years.

3 Existing planning policy framework

National Planning Policy Framework (NPPF) (DCLG March 2012)

- 3.1. To be sound, Plan:MK should be compliant with national planning policy, in which the matter of the stewardship of public open space arises. The NPPF recites the UK Sustainable Development Strategy Securing the Future which sets out five 'guiding principles' including "promoting good governance" which in context can be taken to include consideration of long term stewardship of environmental assets.
- 3.2. NPPF paragraph 7 summarises the three dimensions to sustainable development on which it is focused economic, social and environmental noting under "social" the creation of a "high quality built environment, with accessible local services that reflect the community's needs and support its health, social and cultural well-being" and under the environmental role "protecting and enhancing our natural, built and historic environment...". To apply such principles requires consideration to be given, among other things, to the stewardship of the community's open space assets.
- 3.3. NPPF para 17 sets out "Core planning principles" which include the requirement always to "seek to secure high quality design and a good standard of amenity for all existing and future occupants of land and buildings"; and to "support local strategies to improve health, social and cultural wellbeing for all...". The "local strategy" relevant to public open space is in the Evidence Base for Plan:MK and is referred to in the next section below.
- 3.4. NPPF Para 52. states that "The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities." These principles are set out by the Town and Country Planning Association (TCPA) originally the Garden Cities Association and include explicitly "long term stewardship of community assets" (see TCPA summary diagram below).



- 3.5. NPPF para 57 states that "It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes." That requires making good stewardship arrangements.
- 3.6. NPPF para 70 states that "To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:
 - plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;
 - guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs;..."
 This also takes us to the matter of stewardship.
- 3.7. Last, NPPF para 114. advises that "Local planning authorities should (among other things):
 - set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure; and
 - maintain the character of the undeveloped coast, protecting and enhancing its distinctive landscapes, particularly in areas defined as Heritage Coast, and improve public access to and enjoyment of the coast."

Locally-led Garden Villages, Towns and Cities (DCLG April 2014)

- 3.8. Plan:MK proposes substantial urban extensions to the south, south east, and north east of Milton Keynes, and an area of search for a new settlement in the northern part of the Borough.
- 3.9. The context of Plan:MK includes the recommendation of the National Infrastructure Commission (NIC) (Doc MK/INF/004) accepted by the Chancellor in his Autumn Statement in October 2017, that the Milton Keynes area should expand to 500,000 population by 2050. This is roughly in line with the recommendation of the MK Future Commission who considered the same time span, the report of whom was approved by MK Council (Doc MK/MIS/001).
- 3.10. In inviting proposals for locally-led garden villages, towns and cities a type of development proposed in Plan:MK and likely to recur in one form or another in the period ahead the Application Process Guidance says that proposal must address "Governance Proposals" including these points:
 - "6. Outline the Governance Structure for the Garden Village, setting out the roles of the key project partners; the Local Planning Authority, County Council, LEP, Government Agencies, landowners, developers, RSLs etc.
 - 9. What are the management and stewardship proposals for the proposed Garden Village?"

3.11. Stewardship is a live issue in national policy. To be sound, Plan:MK needs adequately to address the matter.

Local Public Open Space Strategy

- 3.12. The Plan:MK Evidence Base (Doc MK/ENV/012) refers to the Public Open Space: Management Framework for MK: 2013 -2023 (MK Council 2013)
- 3.13. This strategy document notes that Public Open Space (POS) in Milton Keynes is owned and managed by many organisations, with the largest managers being Milton Keynes Parks Trust and Milton Keynes Council. Within the former new town boundary, POS covers approximately 2,895Ha over 30% of the total City area. It says "The generous provision of POS in Milton Keynes contributes to the high quality of life in Milton Keynes; it is a fundamental component of what makes Milton Keynes a great place to do business and live in. The residents of Milton Keynes have told us how much they value their public open space but condition or location may prevent them from visiting it more often. The wider benefits of green and open spaces are nationally recognised by government and a host of national organisations."
- 3.14. Challenges and Opportunities for POS management set out in the strategy include the issue of fragmentation: "The public open space network is being managed, owned and financed by a number of organisations which need to work together sharing skills, knowledge and other resources where possible. Multiple land managers create confusion for public open space users. Public open space needs to be managed strategically as a network to maximise the benefits."
- 3.15. The "Vision" set out in the Strategy is expressed as follows: "Public open space in Milton Keynes reflects and supports the positive participation, aspirations and activities of the community. We will all work to sustain a thriving green network that can adapt to change, supports the eco-system and contributes to a prosperous community". To achieve this "green and open spaces need to be managed not only as individual sites but also collectively...." and MK Council will seek "...to devolve POS where a suitable organisation exists to manage it." and will "Work collaboratively with the partners, service providers and communities. .." and "Identify opportunities to ensure POS can be managed sustainably, bringing in income and managing resources."
- 3.16. There is a list of policies in the Strategy of which these are relevant to the stewardship matter:
 - PAR1 Explore the transfer of public open space to communities or other appropriate organisations
 - Develop an asset register and transfer protocol, and seek community interest by 2013
 - Develop a common standards framework for the management and maintenance of spaces with Public Open Space Partnership Group by 2015
 - PLP L3 Ensure Public Open Space adoption process is fit for purpose and ensure sustainable new development
 - The Public Open Space Management Group will review the adoption process for public open space by 2015
 - QM FI1 Develop a programme of public open space transfer Develop a protocol and process for offering public open space to the Parks Trust, Town and Parish Councils or other suitable bodies.

3.17.	 Plan:MK as proposed is not sound because it does not adequately support this POS Strategy. 			

4 Proposed Local Plan policy framework

- 4.1. The current wording of Policy L4 does not meet the standards or requirements outlined in the NPPF in relation to stewardship or the Vision in Plan:MK and the aspirations in the Public Open Space Strategy. This makes the policy unsound. Critically, the policy fails to establish any minimum standard or approval process for the long term financially sustainable maintenance strategy of public open space.
- 4.2. The objectives that should be reflected in Policy L4 cannot be achieved, and will be ineffective, unless the Policy itself is clearer about the information needed for "a long term financially sustainable maintenance plan".

The proposed changes to the current policy L4

4.3. Paragraph 4 of the current Policy L4 ought to be amended as shown below:

Paragraph 4 of Policy L4

Proposals that include new areas of open space, green infrastructure and parks should include a management and maintenance strategy.

The strategy shall be submitted for the approval of the Council and shall include:

- details of future ownership;
- the <u>identity of the proposed</u> responsible maintenance strategy outlining details of future ownership and the responsible maintenance body (e.g. Parks Trust); <u>and</u>
- a long term financially sustainable maintenance and management plan that can be implemented to be implemented by the responsible maintenance body. This plan shall include details on the following:
 - the funding arrangements for the management body;
 - the standards of stewardship that will be provided by the management body;
 - how appropriate community access to the open space will be facilitated and promoted; and
 - the local employment and training targets of the management body.

Any future ownership body will be required to meet or exceed the standards of stewardship and local community involvement that are achieved by the Milton Keynes Parks Trust or such other appropriate standards as the Council may approve.

Justification for changes

4.4. These changes are needed to ensure that the policy is sound.

- 4.5. New areas of open space, green infrastructure and parks should be provided and maintained to the same high standard as the existing areas in Milton Keynes. Long term stewardship of the public realm is a hallmark of Milton Keynes and the policy framework would not be sound if it did not set out, clearly, how this will be maintained. The revised wording uses the standards achieved by the Parks Trust as a benchmark for the quality that should be achieve by other mechanism for provision and future stewardship of green infrastructure.
- 4.6. A key factor is to ensure that early and proper consideration is given to the cost of maintaining and managing these areas and there is a mechanism to protect future residents from escalating service charges. There is no evidence that the use of service charges is an adequate long term means of securing the continuing maintenance and management of the public realm. The Council need a policy framework that allows them to interrogate whether the future owner(s) of the public open spaces will have the proper means to maintain the areas to the standard prescribed in the maintenance plan. This reduces the risk of private maintenance companies defaulting and creating a patchwork of poorly managed and maintained open spaces.
- 4.7. New public realm must be available to the public and the community at large. The way in which funding is provided can have an effect on access. If new public realm is being created, then the Council needs to be sure that if it is owned by a private management body controlled by the residents of a particular development that it is not provided in a way which makes its use quasi private to the development.
- 4.8. The provision and maintenance of new public space provides real opportunities for local employment and training. The Council wishes to maximise these opportunities and expects any management body to have a clear plan, and achievable targets, for doing so.

5 Conclusion

- 5.1. Open space and the proper stewardship of the public realm is part of the character of Milton Keynes. The policy framework for the creation and management of public space and green infrastructure needs to be carefully calibrated to make sure that that character is maintained.
- 5.2. Policy L4 of the MK Plan is not sound as drafted. It is not effective. Changes are proposed that would remedy this.
- 5.3. Further it is only through further minor modifications to L4 that the Council can be said to have planned positively for the provision, use and maintenance of public open space, green infrastructure and parks.

Appendix A

Stewardship Body Criteria and Standards

Criteria	Standard	Explanatory notes
Does the proposed Management Body (MB) work for the benefit of the public? Is it subject to external regulation?	A registered charity or similar not-for-profit organisation	Registered charities have to comply with a 'public benefit test' and demonstrate this in their annual report. Regulated by the Charity Commission.
Is the MB financially accountable and able to demonstrate that its income is used for the specified purpose of maintaining the parks and open spaces for the public benefit?	A registered charity or similar not-for-profit organisation with audited and published annual accounts that can be readily accessed by the public.	A registered charity has defined charitable objects and its funds can only be spent on those purposes
Can the MB demonstrate public accountability?	 A constitution that requires local authority (council and parish council) nominated directors on its governing body. Must advertise and hold a local public open meeting. Must provide clear information available in the local area over the land it holds and its plans for management and maintenance. 	Clarity and transparency over the governance and decision-making process for the care and maintenance of green space is a key way of ensuring it is maintained in the public interest.
Can the MB demonstrate long term financial security?	Assessment of annual audited accounts.	Management costs will not be evenly spread each year. Accounts should demonstrate the MB has budgeted sustainably and can cover cyclical structural maintenance (e.g. making sinking fund provision)
Will the proposed funding mechanism for the maintenance of the open space by the MB place an ongoing financial cost upon residents?	Provision of sufficient endowment by developer at time of transfer to the MB places no ongoing burden on residents.	
Does the MB have a local profile and presence, open and easily contacted by the public and responsive to public enquiries and concerns?	 A local office and employees. Website with clear information on the land and maintained by the organisation and clear contact detail. A clear, public-focused complaints-handling procedure. 	

Criteria	Standard	Explanatory notes
Does the MB have a form of land tenure over the green space that must be secure in the long term and meets the public interest?	Long lease registered with HM Land registry with obligations to hold and maintain the land as open space according to the planning-approved purpose with freehold held by the local authority or parish council. Or: Freehold subject to charges or covenants in the benefit of the local authority for the land to be held for the approved purpose.	
Does the form of tenure require the MB to keep the land to a good silvicultural, horticultural and arboricultural standard and be open and accessible to the public?	The wording within the Parks Trust's parkland leases or equivalent.	
Does the MB have staff/agents with the necessary skills, qualification and experience to deliver green space maintenance to the required standard?	Assessment of the MO's staff resource and structure compared to organisations that successfully deliver green space maintenance.	A key indicator will be local employment policy and levels of investment in training and development to build the necessary skills for good stewardship.
Can the MB deliver additional services that promote the public's safe use and enjoyment of the open spaces and parks	 Provision of ranger, education and events services. Health and safety policy and management framework in place that is geared to the requirements of maintain public open space. 	Ranger/warden presence is often essential to prevent an area going downhill and becoming unattractive for example to tackle anti- social behaviour and respond quickly to incidents such as fly tipping and illicit camping.